

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

LATASHA MONROE,
Administratrix of the Estate of Honesty Jade
Bishop,

Plaintiff,

v.

TREVOR FOLEY, in his official capacity as
Director of the Missouri Department of
Corrections , et al.

Defendants.

Cause No. 2:23-cv-04129-BCW

JOINT MOTION FOR EXTENSION OF TIME

COME NOW the Parties, by their undersigned counsel, and respectfully request a 30-day extension of time to the current deadlines for motions to amend pleadings; expert witness designations; and the close of discovery, and in support, state as follows:

1. Trial in the matter is currently set for April 6, 2026. Dkt. 112.
2. Pursuant to the Amended Scheduling and Trial Order, motions to amend pleadings or add parties are due by June 2, 2025; expert witness designations are due June 30, 2025 for Plaintiff and July 31, 2025 for Defendants; and discovery closes on August 29, 2025. *Id.*
3. On May 5, 2025, the Parties participated in a facilitated mediation session through the Western District of Missouri's Mediation and Assessment Program, during which the Parties made significant progress towards settlement in the current matter, but have not completed negotiations. *See generally* Dkt. 107.
4. The parties would benefit from some time to focus on mediation.

5. As such, the Parties respectfully request a 30-day extension of time to the aforementioned deadlines so that the Parties can focus on meaningfully engaging in settlement negotiations.
6. Should these final negotiations be unsuccessful, the Parties are prepared to resume litigation and the requested extension of time does not impact the dispositive motion deadline (currently set for November 10, 2025) or the trial date. *Id.*

WHEREFORE, the Parties pray to this honorable Court to grant this motion together with any such other and further relief this Court deems just and proper under these circumstances.

Dated: May 15, 2025

Respectfully submitted,

By: /s/ Susannah Porter Lake

**RODERICK & SOLANGE MACARTHUR
JUSTICE CENTER**

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